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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY
PRODUCTS LIABILITY LITIGATION

This Document Relates to:

*H.D. filed on behalf of minor J.D. v. Meta
Platforms, Inc., et al., 4:23-cv-01425;*

Case No. 4:22-MD-03047-YGR

MDL No. 3047

**DECLARATION OF JENNIE LEE
ANDERSON IN SUPPORT OF
PLAINTIFFS' ADMINISTRATIVE
MOTION TO FILE UNDER SEAL
EXHIBITS TO THE DECLARATION OF
JENNIE LEE ANDERSON IN SUPPORT
OF PLAINTIFFS' SECOND**

**CONSOLIDATED EX PARTE
APPLICATION FOR APPOINTMENT
OF GUARDIANS AD LITEM**

Jeffrey Barnes, filed on behalf of minor A.B. v. Meta Platforms, Inc., et al., 4:23-cv-01422;

Richard Neal Booker, individually and on behalf of their minor child S.B. v. Meta Platforms, Inc., et al., 4:23-cv-01537;

C. G. filed on behalf of minor A.G. v. Meta Platforms, Inc., et al., 4:23-cv-01568;

N.K. filed on behalf of minor S.K. v. Meta Platforms, Inc., et al., 4:23-cv-01584;

M.M., filed on behalf of minor B.M. v. Meta Platforms, Inc., et al., 4:23-cv-01615;

C.S., filed on behalf of minor J.S. v. Meta Platforms, Inc., et al., 4:23-cv-01569;

S.S. filed on behalf of minor M.S. v. Meta Platforms, Inc., et al., 4:23-cv-02024; and

K.C. filed on behalf of minor M.C. v. Meta Platforms, Inc., et al., 4:23-cv-01465

I, Jennie Lee Anderson, do hereby declare and state as follows:

1. I am a partner with the law firm of Andrus Anderson LLP. I am duly admitted to practice before the courts of the State of California and in the Northern District of California. I am the Court-appointed Liaison Counsel for Plaintiffs in *In re Social Media Adolescent Addiction/Personal Injury Products Litigation*, Case No. 4:33-MD-03047, and a counsel of record for the Plaintiff in *Rodriguez v. Meta Platforms, Inc., et al.*, Case No. 4:22-cv-00401. I make this declaration of my own personal knowledge and, if called as a witness, I could and would testify competently to the matters stated below.

2. I make this declaration in support of Plaintiffs' Administrative Motion to File Under Seal Exhibits to the Declaration of Jennie Lee Anderson in Support of Plaintiff's Second Consolidated *Ex Parte* Application for Appointment of Guardian *Ad Litem* ("Administrative Motion to Seal").

3. For the reasons set forth in Plaintiffs’ administrative motion to seal filed on February 28, 2023 (ECF No. 147) and the Administrative Motion to Seal filed herewith, Plaintiffs seek to seal the Exhibits attached to the Declaration of Jennie Lee Anderson in Support of Plaintiffs’ Second Consolidated *Ex Parte* Application for Appointment of Guardians *Ad Litem* (“Anderson Declaration”).

4. True and correct copies of the following Exhibits to the Support of Anderson Declaration are as follows and attached hereto:

- *H.D. filed on behalf of minor J.D. v. Meta Platforms, Inc., et al.*, 4:23-cv-01425 (Exhibit 1);
- *Jeffrey Barnes, filed on behalf of minor A.B. v. Meta Platforms, Inc., et al.*, 4:23-cv-01422 (Exhibit 2);
- *Richard Neal Booker, individually and on behalf of their minor child S.B. v. Meta Platforms, Inc., et al.*, 4:23-cv-01537 (Exhibit 3);
- *C. G. filed on behalf of minor A.G. v. Meta Platforms, Inc., et al.*, 4:23-cv-01568 (Exhibit 4);
- *N.K. filed on behalf of minor S.K. v. Meta Platforms, Inc., et al.*, 4:23-cv-01584 (Exhibit 5);
- *M.M. filed on behalf of minor B.M. v. Meta Platforms, Inc., et al.*, 4:23-cv-01615 (Exhibit 6);
- *C.S., filed on behalf of minor J.S. v. Meta Platforms, Inc., et al.*, 4:23-cv-01569 (Exhibit 7);
- *S.S. filed on behalf of minor M.S. v. Meta Platforms, Inc., et al.*, 4:23-cv-02024 (Exhibit 8); and
- *K.C. filed on behalf of minor M.C. v. Meta Platforms, Inc., et al.*, 4:23-cv-01465 (Exhibit 9).

5. Pursuant to Civil Local Rule 7-11, I contacted Liaison Counsel for Defendants April 26, 2023, to ask Defendants to stipulate that these documents may be filed under seal. Liaison Counsel confirmed that Defendants will so stipulate, but do not waive, and expressly

1 reserve, their right to seek an order or orders in the future to unseal individual applications and/or
2 require parents who wish to proceed pseudonymously going forward make a showing of good
3 cause.

4 I declare under penalty of perjury pursuant to the laws of the United States of America that
5 the foregoing is true and correct.

6
7 Dated: April 26, 2023

Respectfully submitted,

8 /s/Jennie Lee Anderson
9 Jennie Lee Anderson
10 *Plaintiffs' Liaison Counsel*

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